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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON TALCUM
POWDER PRODUCTS MARKETING, SALES
PRACTICES, AND PRODUCTS LIABILITY
LITIGATION**

This document relates to: Maria Christina
Napoli
Case No. 3:20-cv-18220-FLW-LHG

MDL No. 16-2738 (MAS) (RLS)
Judge Michael A. Shipp
Mag. Judge Rukhsanah L. Singh
Civil Action No.: 3:20-cv-18220

**NOTICE AND SUGGESTION OF DEATH OF
PLAINTIFF MARIA CHRISTINA NAPOLI**

Pursuant to Fed.R.Civ.P. 25(a), Case Management Order 9 (ECF 164139), and the Court's May 15, 2024 Order Regarding CMO 9 (ECF 182587), undersigned counsel hereby gives notice of death of Plaintiff Maria Christina Napoli, who died on June 5, 2022, with associated intent to substitute the proper party, the Estate of Maria C. Napoli. A copy of Plaintiff Maria Christina Napoli's death certificate (redacted pursuant to Fed.R.Civ.P. 52) is attached and incorporated herein as Exhibit 1.

Additionally, pursuant to the Court's October 10, 2023 Order Governing Amendments to Complaints (ECF 167585), undersigned counsel also respectfully advises this Court that an Amended Complaint, substituting the Proper Party, will be filed by the Estate of Maria C. Napoli by and through her surviving son and Personal Representative David Shetzen. (See Exhibit 2, establishing such person's authority to prosecute the action). A claim for wrongful death on behalf of all wrongful death statutory beneficiaries shall also be added thereto, by and through Plaintiffs David Shetzen and Eric Shetzen.

DATED: June 4, 2024

KNAPP & ROBERTS

/s/ Craig A. Knapp